

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CASE No. 1:20-CV-11889-MLW

Dr. SHIVA AYYADURAI)
Plaintiff,)
)
v.)
)
WILLIAM FRANCIS GALVIN,)
MICHELLE K. TASSINARI,)
DEBRA O'MALLEY,) JURY DEMANDED
AMY COHEN,)
NATIONAL ASSOCIATION OF)
STATE ELECTION DIRECTORS,)
all in their individual capacities, and)
WILLIAM FRANCIS GALVIN,)
in his official capacity as Secretary)
of State for Massachusetts,)
Defendants.)

STATUS REPORT REGARDING PERFECTION OF SERVICE
UPON DEFENDANTS AMY COHEN AND NASED

Plaintiff is pleased to inform this court that since his December 16, 2020 status report, Defendant Amy Cohen has been served in hand in her individual capacity and also as Executive Director for Defendant NASED.

Within one minute of filing the returns of service on ECF, Plaintiff was contacted via email by a member of the Massachusetts bar, Nolan Mitchell (BBO# 668145), now at Nelson Mullins Inc., and previously Attorney Adam Hornstine's colleague at Wilmer Hale. Mitchell had previously not answered to Plaintiff's second request to accept service on behalf of these two Defendants that has been filed with this court.

In this December 17, 2020, email, pasted below, Attorney Mitchell stated that unless Plaintiff undertook in writing to not reveal Defendant Cohen's home address in court pleadings, he would seek a protective order from this court, despite there being no history of the Plaintiff

“doxxing” any person at any time. Plaintiff takes this request as confirmation that Defendant Cohen consciously intended to evade service by actively concealing her home address and refusing to grant appointments at NASED headquarters to be served on behalf of NASED.

Respectfully submitted under the pains and penalties of perjury,

/s/ Dr. Shiva Ayyadurai

Date: December 17, 2020

Dr. Shiva Ayyadurai
Plaintiff, *pro se*
701 Concord Ave,
Cambridge, MA 02138
Phone: 617-631-6874
Email: vashiva@vashiva.com

CERTIFICATE OF SERVICE

Plaintiff certifies that he served this status report upon Defendants Cohen and NASED, via their attorney, Nolan Mitchell by email (nolan.mitchell@nelsonmullins.com) as they have yet to appear in this court, and upon the other defendants via their counsel, Adam Hornstine Esq., via ECF.

Respectfully submitted under the pains and penalties of perjury,

/s/ Dr. Shiva Ayyadurai

Date: December 17, 2020

Dr. Shiva Ayyadurai
Plaintiff, *pro se* EMA

EMAIL FROM NOLAN MITCHELL ESQ.

From: Nolan Mitchell <nolan.mitchell@nelsonmullins.com>
Date: Thu, Dec 17, 2020 at 5:22 PM
Subject: RE: 11889 Ayyadurai v. Cohen & NASED
To: Shiva Ayyadurai <vashiva@vashiva.com>

Dr. Ayyadurai,

Ms. Cohen informs me she has been served. I’m writing to request, as a courtesy, that you agree to refrain from publicly disclosing Ms. Cohen’s personal contact information or personal address in any filing, through social media, or otherwise. There have been a number of unfounded allegations made against her personally, which have resulted in comments by other Twitter users that have been ominous and threatening in tone. I understand that you have no

control over what other people post on Twitter, but in the current environment there are legitimate safety concerns.

I assume this wont present an issue, but if for some reason you won't agree Ms. Cohen will seek a protective order from the Court so please don't disclose her personal information until that is resolved.

Please confirm your agreement, and thanks in advance for the courtesy. Best,

Nolan

NOLAN J. MITCHELL PARTNER

nolan.mitchell@nelsonmullins.com

ONE POST OFFICE SQUARE | 30TH FLOOR

BOSTON, MA 02109

T 617.217.4729 M 617.851.7160 F 617.217.4710

From: Shiva Ayyadurai <vashiva@vashiva.com>

Sent: Wednesday, December 16, 2020 8:44 AM

To: Nolan Mitchell <nolan.mitchell@nelsonmullins.com>

Subject: Re: 11889 Ayyadurai v. Cohen & NASED

Dear Attorney Mitchell:

Please file attached the status report I filed this morning.

Sincerely,

-Dr. Shiva Ayyadurai